

**THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

UNITED STATES OF AMERICA)
)
)
v.)
)
ANNE MY'REE PARHAM)

CR. NO. 1:07-cr-59-MHT

MOTION FOR DOWNWARD DEPARTURE

Comes now the United States of America, by and through Leura G. Canary, United States Attorney for the Middle District of Alabama, and pursuant to the United States Sentencing Commission, Guidelines Manual, Section 5K1.1, respectfully request this Honorable Court to downwardly depart one (1) level in the sentence that would otherwise be imposed on Defendant Anne My'ree Parham, and as reasons therefore, submits the following:

The United States herein states that Parham has provided substantial assistance in the investigation of this case and investigation of other individuals in other districts. Parham also has made herself available for subsequent debriefings, and the United States submits that she has, at all times, been truthful with federal investigators.

Wherefore, premises considered, the United States moves this Honorable Court for a downward departure from the calculated guideline range. This motion seeks a departure of one (1) level from a total offense level of 11 and Criminal History Category of I.

Respectfully submitted this 25th day of July, 2007.

LEURA G. CANARY
UNITED STATES ATTORNEY

/s/ Jerusha T. Adams
JERUSHA T. ADAMS
Assistant United States Attorney
Post Office Box 197
Montgomery, Alabama 36101-0197
334-223-7280 phone 334-223-7135 fax
jerusha.adams@usdoj.gov

**THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

UNITED STATES OF AMERICA

)

v.

)

ANNE MY'REE PARHAM

)

CR. NO. 1:07-cr-59-MHT

CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Jennifer A. Hart.

Respectfully submitted,

LEURA G. CANARY
UNITED STATES ATTORNEY

/s/ Jerusha T. Adams
JERUSHA T. ADAMS
Assistant United States Attorney
Post Office Box 197
Montgomery, Alabama 36101-0197
334-223-7280 phone 334-223-7135 fax
jerusha.adams@usdoj.gov